

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CHARLES ROBINSON, )  
v. Plaintiff, ) Civil Action No. 04-11964-NG  
TELESECTOR RESOURCES GROUP, INC. D/B/A )  
VERIZON SERVICES GROUP, )  
Defendant. )  
\_\_\_\_\_  
)

**DEFENDANT'S MOTION IN LIMINE TO EXCLUDE EVIDENCE OF OTHER  
ALLEGED INSTANCES OF AGE DISCRIMINATION**

The Defendant Telesector Resources Group, Inc. d/b/a Verizon Services Group (“Verizon”) respectfully moves this Court to preclude Plaintiff Charles Robinson (“Robinson”) from introducing evidence of or referencing any allegations of age discrimination by any Verizon employees other than Plaintiff, including but not limited to evidence concerning hearsay statements allegedly made by two former co-workers fifteen years prior to the termination of Plaintiff’s employment. Evidence of other alleged instances of age discrimination must be excluded because: (1) it is not relevant to Plaintiff’s claim of age discrimination; (2) the alleged statements of Plaintiff’s co-workers constitute inadmissible hearsay; and (3) the unduly prejudicial effect of such evidence substantially outweighs any probative value.

In support of its Motion, the Defendant submits herewith its Memorandum of Law.

Respectfully submitted,

The Defendant,  
TELESECTOR RESOURCES GROUP, INC.  
D/B/A VERIZON SERVICES GROUP,  
By its attorneys,

/s/ John P. McLafferty  
John P. McLafferty, BBO #639179  
Felix J. Springer (pro hac vice)  
DAY, BERRY & HOWARD LLP  
One International Place  
Boston, Massachusetts 02110  
(617) 345-4600

DATED: September 27, 2006

**CERTIFICATE OF SERVICE**

I, John P. McLafferty, do hereby certify that on this 27th day of September, 2006, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing(s) to the following: Frank L. Fragomeni, Jr., Esquire, 15 Broad Street, Suite 501, Boston, Massachusetts 02109.

/s/ John P. McLafferty  
John P. McLafferty